

1 Christopher D. Jaime, Esq., Nev. Bar #4640  
2 Maupin, Cox & LeGoy  
3 4785 Caughlin Parkway  
4 P.O. Box 30000  
5 Reno, Nevada 89520  
6 Telephone: (775) 827-2000  
7 Fax: (775) 827-2185  
8 E-mail: cjaime@mclrenolaw.com  
9 Attorneys for Defendant Director of the  
10 Firm Foundation

11 UNITED STATES BANKRUPTCY COURT

12 DISTRICT OF NEVADA

13 IN RE: Case No: 10-51372-gwz

14 ROGER PIERRE BAYLOCQ, Chapter 11

15 Debtor.

16 ROGER PIERRE BAYLOCQ,

Adv. No. 13-05052-gwz

17 Plaintiff,

**STIPULATION TO VACATE AND  
CONTINUE HEARING ON MOTION  
TO DISMISS COMPLAINT TO AVOID  
LIENS OF RECORD**

18 vs.

19 WELLS FARGO BANK, N.A.;  
20 et al.,

(No Hearing Required)

21 Defendants.

22 Defendant Director of the Firm Foundation, a Church Corporation filed with the Washington  
23 Secretary of State, as Trust of the Harvest Time Foundation ("HTF") and Plaintiff Roger Pierre  
24 Baylocq ("Debtor") (HTF and the Debtor, collectively, the "Parties"), by and through their respective  
25 undersigned counsel, hereby stipulate and agree as follows:

- 26 1. On August 26, 2013, the Debtor filed a *Complaint to Avoid Liens of Record* [Adv.

1 Dkt. 1] ("Complaint"). The Complaint seeks to avoid HTF's judgment lien on real property located  
2 at 2370 Damonte Lane, Reno, Nevada.

3  
4 2. On October 17, 2013, HTF filed a *Motion to Dismiss Complaint to Avoid Liens of*  
5 *Record* [Dkt. 21] ("Motion"). A hearing on the Motion is currently set for December 17, 2013, at  
6 2:00 p.m.

7  
8 3. The Parties have engaged in settlement discussions and wish to continue the same in  
9 an effort to resolve their disputes. The Parties believe they may be able to resolve their dispute  
10 without the need for a hearing and determination on the Motion.

11 4. In order to facilitate further settlement discussions, the Parties have agreed to vacate  
12 the hearing on the Motion currently set for December 17, 2013, at 2:00 p.m. and to continue that  
13 hearing to February 25, 2014, at 2:00 p.m.

14  
15 5. The Parties further agree that for purposes of the continued hearing on the Motion any  
16 opposition to the Motion and reply to any opposition shall be filed in accordance with LR 9014(d).

17 Dated this 9th day of December, 2013.

18 WHITE LAW CHTD.

MAUPIN, COX & LeGOY

19  
20 By: /s/ John White

By: /s/ Christopher D. Jaime

21 John White, Esq.  
22 Nevada Bar No. 1741  
335 W. First St.  
Reno, NV 89503

Christopher D. Jaime, Esq.  
Nevada Bar No. 4640  
4785 Caughlin Parkway  
Reno, NV 89519

23 Attorney for Plaintiff

24 Attorney for Defendant Director of the Firm  
Foundation

CERTIFICATE OF SERVICE

I certify under penalty of perjury that I am an employee of MAUPIN, COX & LeGOY, Attorneys at Law, and that on the date indicated below, I served the foregoing document(s) described as follows:

**STIPULATION TO CONTINUE HEARING ON  
MOTION TO DISMISS COMPLAINT  
TO AVOID LIENS OF RECORD**

on the party(s) set forth below by:

\_\_\_\_\_ Placing an original or true copy thereof in a sealed envelope placed for collection and mailing in the United States Mail, at Reno, Nevada, postage paid, following ordinary business practices, addressed as follows:

XXX Electronic filing via the U.S. Bankruptcy Court CM/ECF filing system, to all those persons listed on the United States Bankruptcy Court ECF Confirmation Sheet.

DATED this 9<sup>th</sup> day of December, 2013.

/s/ Karen Bernhardt  
KAREN BERNHARDT